

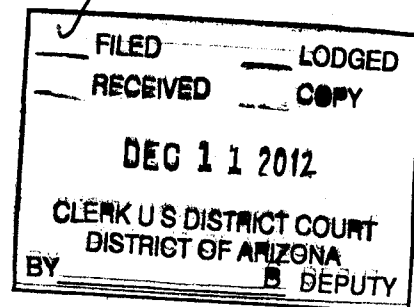
Florence, Alexander P909501
 Name and Prisoner/Booking Number
Fourth Avenue Jail

Place of Confinement
201 S. 4th Avenue

Mailing Address
Phoenix, AZ 85003

City, State, Zip Code

(Failure to notify the Court of your change of address may result in dismissal of this action.)



IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA

ALEXANDER NAPIER FLORENCE
 (Full Name of Plaintiff)

Plaintiff,

vs.

(1) ROBERT RAMSEY
 (Full Name of Defendant)

(2) ET. AL.

(3) _____

(4) _____

Defendant(s).

☒ Check if there are additional Defendants and attach page 1-A listing them.

CV-12-02641-PHX-RCB(BSB)

CASE NO. _____
 (To be supplied by the Clerk)

CIVIL RIGHTS COMPLAINT
 BY A PRISONER

(JURY TRIAL DEMANDED)

- ☒ Original Complaint
☐ First Amended Complaint
☐ Second Amended Complaint

A. JURISDICTION

1. This Court has jurisdiction over this action pursuant to:

☒ 28 U.S.C. § 1343(a); 42 U.S.C. § 1983

☐ 28 U.S.C. § 1331; Bivens v. Six Unknown Federal Narcotics Agents, 403 U.S. 388 (1971).

☐ Other: _____

2. Institution/city where violation occurred: PHOENIX, ARIZONA
CACTUS PRECINCT

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CONT.

DEFENDANTS

- 1) ROBERT RAMSEY
- 2) JOHN TALLEY
- 3) B. NEIL
- 4) J. IMDOORF
- 5) K. LAIRD
- 6) LIEUTENANT KNOWELLS
- 7) D. BURTHIAUME
- 8) K. WEBBER
- 9) M. HOEVE
- 10) R. KUHN
- 11) L. LATTANZI
- 12) K. VINE
- 13) G. WILSON
- 14) OFFICER COLLINS
- 15) OFFICER TENERS

B. DEFENDANTS

1. Name of first Defendant: ROBERT RAMSEY. The first Defendant is employed as:
PHOENIX POLICE OFFICER # 6324 at PHOENIX POLICE DEPT. 12220 N. 39TH AVE
(Position and Title) (Institution) PHOENIX, AZ 85019
2. Name of second Defendant: JOHN TALLEY. The second Defendant is employed as:
PHOENIX POLICE OFFICER # 8448 at PHOENIX POLICE DEPT. 12220 N. 39TH AVE
(Position and Title) (Institution) PHOENIX, AZ 85019
3. Name of third Defendant: B. NEIL. The third Defendant is employed as:
PHOENIX POLICE OFFICER # 5788 at PHOENIX POLICE DEPT. 12220 N. 39TH AVE
(Position and Title) (Institution) PHOENIX, AZ 85019
4. Name of fourth Defendant: J. IMPDORF. The fourth Defendant is employed as:
PHOENIX POLICE OFFICER # 5212 at PHOENIX POLICE DEPT. 12220 N. 39TH AVE
(Position and Title) (Institution) PHOENIX, AZ 85019

If you name more than four Defendants, answer the questions listed above for each additional Defendant on a separate page.

C. PREVIOUS LAWSUITS

1. Have you filed any other lawsuits while you were a prisoner? ☒ Yes ☐ No
2. If yes, how many lawsuits have you filed? ONE. Describe the previous lawsuits:
 - a. First prior lawsuit:
 1. Parties: FLORENCE v. FEDERICO ET. AL.
 2. Court and case number: INFORMATION NOT AVAILABLE TO ME.
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) DISMISSED//
DUE TO TIME FRAMES//
 - b. Second prior lawsuit:
 1. Parties: _____ v. _____
 2. Court and case number: _____
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) _____
 - c. Third prior lawsuit:
 1. Parties: _____ v. _____
 2. Court and case number: _____
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) _____

If you filed more than three lawsuits, answer the questions listed above for each additional lawsuit on a separate page.

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FIFTH DEFENDANT: K. LAIRD. THE FIFTH DEFENDANT IS EMPLOYED AS:
PHOENIX POLICE SERGEANT # 5573 AT PHOENIX POLICE DEPT.

SIXTH DEFENDANT: LIEUTENANT KNOWLES. THE SIXTH DEFENDANT IS
EMPLOYED AS: PHOENIX POLICE LIEUTENANT AT PHOENIX POLICE DEPT.

SEVENTH DEFENDANT: D. BURTHIAUME. THE SEVENTH DEFENDANT IS
EMPLOYED AS: PHOENIX POLICE OFFICER # 6059 AT PHOENIX POLICE DEPT.

EIGHTH DEFENDANT: K. WEBBER. THE EIGHTH DEFENDANT IS EMPLOYED AS:
PHOENIX POLICE OFFICER # 7572 AT PHOENIX POLICE DEPT.

NINTH DEFENDANT: M. HOEVE. THE NINTH DEFENDANT IS EMPLOYED AS:
PHOENIX POLICE OFFICER # 5155 AT PHOENIX POLICE DEPT.

TENTH DEFENDANT: R. KUHN. THE TENTH DEFENDANT IS EMPLOYED AS:
PHOENIX POLICE OFFICER # 5804 AT PHOENIX POLICE DEPT.

ELEVENTH DEFENDANT: L. LATTANZI. THE ELEVENTH DEFENDANT IS
EMPLOYED AS: PHOENIX POLICE OFFICER # 6331 AT PHOENIX POLICE DEPT.

TWELTH DEFENDANT: K. VINE. THE TWELTH DEFENDANT IS EMPLOYED AS:
PHOENIX POLICE OFFICER # 5224 AT PHOENIX POLICE DEPT.

THIRTEENTH DEFENDANT: G. WILSON. THE THIRTEENTH DEFENDANT IS
EMPLOYED AS: PHOENIX POLICE OFFICER # 5746 AT PHOENIX POLICE DEPT.

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PAGE 2-B

FOURTEENTH DEFENDANT: OFFICER COLLINS. THE FOURTEENTH DEFENDANT IS EMPLOYED AS: PHOENIX POLICE OFFICER #8813 AT PHOENIX POLICE DEPT.

FIFTEENTH DEFENDANT: OFFICER TEWERS. THE FIFTEENTH DEFENDANT IS EMPLOYED AS: PHOENIX POLICE OFFICER #8698 AT PHOENIX POLICE DEPT.

D. CAUSE OF ACTION

COUNT I

1. State the constitutional or other federal civil right that was violated: FOURTH AMENDMENT
UNREASONABLE SEIZURE OF PERSON.

2. Count I. Identify the issue involved. Check **only one**. State additional issues in separate counts.

- | | | | |
|---|---|---|---------------------------------------|
| <input type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input checked="" type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: _____ | |

3. **Supporting Facts.** State as briefly as possible the FACTS supporting Count I. Describe exactly what each Defendant did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.

ON 5-15-12, I WAS ARRESTED BY PHOENIX POLICE DEPT. DURING THAT ARREST I WAS REPEATEDLY TAZED WHILE CUFFED BY OFFICER RAMSEY AND OFFICER TALLEY. BOTH ADMIT THIS IN POLICE REPORT. ALSO DURING THIS ARREST I WAS REPEATEDLY STRUCK IN THE LEFT SIDE OF MY FACE CAUSING 2 FRACTURES TO MY SKULL. BY OFFICER RAMSEY I WAS THEN DRAGGED ACROSS THE CONCRETE & TAZED AGAIN BY OFFICER RAMSEY, OFFICERS WEBBER, VINE, WILSON, HOVE, LARD, BURTHAUME. THEN STANDING UP AND REPEATEDLY STRUCK & KICKED ME. OFFICER NIEL STANDING UP AND RIPPED THE TAZER PRONGS OUT OF MY BACK, WHICH IS SUPPOSED TO BE DONE BY MEDICAL PROFESSIONAL. ALSO NOT POLICE OFFICERS OFFICER TALLEY & OFFICER RAMSEY TO COVER UP FOR THE ASSAULT ON ME & RAMSEY FILED FALSE CHARGES TO ALSO COVER UP FOR THIS TRAVESTY OF JUSTICE BROUGHT ON BY THE NOTORIOUS ACTIONS OF THE PHOENIX POLICE DEPARTMENT.

4. **Injury.** State how you were injured by the actions or inactions of the Defendant(s).

I WAS IMMEDIATELY TRANSPORTED BY PHOENIX FIRE DEPT. TO ST. MARY'S IN PHOENIX FOR HOSPITALIZATION, BUT MY INJURIES WERE SO SEVERE THAT I THEN HAD TO BE TRANSPORTED
CONT. PAGE 3-A

5. **Administrative Remedies:**

- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☒ Yes ☐ No
- Did you submit a request for administrative relief on Count I? ☒ Yes ☐ No
- Did you appeal your request for relief on Count I to the highest level? ☐ Yes ☒ No
- If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. WAS TOLD BY MARICOPA COUNTY SHERIFF'S OFFICER GRIEVANCE SERGEANT I CANNOT GRIEVE PHOENIX POLICE DEPT. FROM COUNTY SAIL I HAVE COPY OF RESPONSE

PAGE 3-A

CONT. TO BANNER GOOD SAMARITAN HOSPITAL FOR "FURTHER TREATMENT." I SPENT 2 MORE DAYS IN I.C.U. AT GOOD SAMARITAN & 3 DAYS ON A REGULAR FLOOR, 5 DAYS TOTAL AND SUSTAINED THE FOLLOWING INJURIES: "DEPRESSED FRACTURE OF THE LATERAL WALL OF THE MAXILLARY SINUS AS WELL AS A COMMINUTED FRACTURE OF THE LEFT ZYGOMA." 2 FACIAL LACERATIONS REQUIRING 10 STITCHES & PERMANENT MUSCLE & NERVE DAMAGE TO MY LEFT HAND SIDE OF MY FACE, AS WELL AS ROAD RASH BURNS TO BOTH MY SHOULDERS, BOTH SIDES OF MY STOMACH, BOTH ELBOWS, MY ANKLE, ELECTROCUTION BURNS TO MY WRISTS WHERE THE CUFFS WERE BURNED ONTO MY WRISTS, LEFT EYE SWOLLEN SHUT, LEFT EAR CALLYFLOWERED & SWOLLEN. I NOW HAVE PERMANENT DISFIGUREMENT TO MY FACE, PERMANENT MUSCLE DAMAGE TO THE LEFT SIDE OF MY FACE, PERMANENT NERVE DAMAGE TO LEFT HAND SIDE OF MY FACE, MILD PERMANENT BRAIN DAMAGE, LOSS OF MEMORY, MENTAL & EMOTIONAL ANGUISH, PERMANENT PARTIAL LOSS OF SIGHT, PERMANENT SCARRING (MENTAL & EMOTIONAL & PHYSICAL) PERMANENT & CONSTANT PAIN & SUFFERING, CHRONIC MIGRAINE HEADACHES, MENTAL TORMENT RESULTING IN MENTAL HEALTH MEDICATION FOR ANXIETY PARANOID & DEPRESSION.

E. REQUEST FOR RELIEF

State the relief you are seeking:

I WOULD LIKE ALL MEDICAL & HOSPITAL BILLS PAID, MEDICATION
& ANY LONG TERM CARE PAID FOR. I WOULD ALSO LIKE TO
RECEIVE (5) FIVE MILLION DOLLARS COMPENSATORY FOR PAIN SUFFERING
& PERMANENT PHYSICAL & EMOTIONAL & MENTAL CONDITIONS
STEMMING FROM THIS ASSAULT AND 100,000 ONE HUNDRED
THOUSAND DOLLARS EACH FOR PUNITIVE DAMAGES
FOR EACH OFFICER INVOLVED IN THIS INCIDENT

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 12-4-12
DATE


SIGNATURE OF PLAINTIFF

(Name and title of paralegal, legal assistant, or
other person who helped prepare this complaint)

(Signature of attorney, if any)

(Attorney's address & telephone number)

ADDITIONAL PAGES

All questions must be answered concisely in the proper space on the form. If you need more space, you may attach no more than fifteen additional pages. But the form must be completely filled in to the extent applicable. If you attach additional pages, be sure to identify which section of the complaint is being continued and number all pages.

**MARICOPA COUNTY SHERIFF'S OFFICE
JOSEPH M. ARPAIO SHERIFF**

CERTIFICATION

I hereby certify that on this date 12/06/12,

I mailed the original and one (1) copy to the Clerk of the United States District Court, District of Arizona.

I further certify that copies of the original have been forwarded to:

____ Hon _____ United States District Court, District of Arizona.

____ Hon _____ United States District Court, District of Arizona.

____ Attorney General, State of Arizona.

____ Judge, _____, Superior Court, Maricopa County, State of Arizona.

____ County Attorney _____, Maricopa County, State of Arizona,

____ Public Defender _____, Maricopa County, State of Arizona.

____ Attorney _____



INMATE LEGAL SERVICES
Maricopa County Sheriff's Office
201 S. 4th Avenue
Phoenix, AZ 85003

9909501
MARICOPA COUNTY SHERIFF'S OFFICE
INMATE LEGAL SERVICES
201 S. 4th AVENUE
PHOENIX, AZ 85003

RECEIVED
DEC 11 2012
CLERK OF U.S. DISTRICT COURT
UNITED STATES DISTRICT COURT
PHOENIX, AZ

Clerk of United States District Court
United States District Court House
401 W. Washington St.
Suite 130 SPC 1, U.S. Court House
Phoenix, AZ 85003

